

AO 91 (Rev 8/01) Criminal Complaint

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

United States Courts Southern

UNITED STATES OF AMERICA

District of Texas

V.

FILED

CRIMINAL COMPLAINT

Andres Mateo-Castillo

Mexico

October 14, 2021

Case Number:

YOB: 1997

M-21- 2182 -M

Nathan Ochsner, Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 13, 2021 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Ariel Lopez-Vidal, citizen and national of Mexico, Jackelinne Xiomara Giron-Araniva, citizen and national of El Salvador, and Roberto Rodriguez-Mancia, citizen and national of Honduras, along with fifteen (15) other undocumented aliens, for a total of eighteen (18) who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempted to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation, to wit: a residence located in Alamo, Texas

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) FELONY
I further state that I am a(n) U.S. Border Patrol Agent and that this complaint is based on the following facts:

On October 8, 2021, Border Patrol agents received information from an illegal alien (IA) in Border Patrol custody regarding a residence being used to harbor IAs in Alamo, Texas.

On October 12, 2021, upon surveilling the residence, agents observed a white utility van with a male driver and several subjects arrive and enter the residence. Minutes later, the driver left residence in the van.

SEE ATTACHED.

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Complaint authorized by AUSA P. Warner

Submitted by reliable electronic means, sworn to and attested telephonically per Fed. R. Cr.P.4.1, and probable cause found on:

Sworn to before me and subscribed in my presence,

October 14, 2021 6:00 PM
Date

at McAllen, Texas
City and State

Nadia S. Medrano, U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Complainant

Rosendo Agda Border Patrol Agent
Printed Name of Complainant

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-21- 2182 -M

RE: Andres Mateo-Castillo

A220 690 390

CONTINUATION:

On October 13, 2021, while continuing surveillance at the TL, agents observed the same white utility van driven by the same subject arrive and then depart just a few minutes later. At this point, agents requested assistance from the Hidalgo County Sheriff's Office to assist with the investigation. HCSO located the vehicle and conducted a traffic stop on Alamo Road due to traffic infraction.

Agents then approached the traffic stop location and identified themselves as Border Patrol agents. The driver, identified as Andres Mateo-Castillo, was asked about his involvement with alien smuggling at the TL to which he denied. Agents determined Mateo was illegally present in the United States. The passenger, identified as Jackeline Xiomara Giron-Araniva, was asked about her involvement with alien smuggling. Giron denied any involvement and stated that she was staying at the TL where Mateo picked her up to go buy food and water for the people staying there. Giron freely and willfully admitted that there were about fifteen (15) subjects being harbored at the target location. Agents determined Giron was illegally present in the United States.

Agents and HCSO Deputies proceeded to the TL and conducted a knock and talk. After several knocks, agents observed a male subject open the door. Eight (8) subjects freely and willfully exited the TL. While escorting a subject inside the TL to retrieve his belongings, agents observed in plain view nine (9) additional subjects inside a closet. All seventeen (17) subjects were determined to be illegally present in the United States. A total of nineteen (19) subjects were placed under arrest and transported to the McAllen Processing Center for processing.

PRINCIPAL SWORN STATEMENT:

Andres Mateo-Castillo, a Mexican citizen, was read his Miranda Rights and was willing to make a statement.

MATEO agreed to pay \$7,000 to be smuggled into the United States. Mateo indicated that after he crossed the river, he was taken to the stash house. Mateo stated upon arrival to the stash house, the caretaker named "Luis" received him and asked for his biographical data and took possession of his cellular phone. Mateo stated during his four (4) months stay at the stash house, he has seen approximately four hundred (400) people come and go to the stash house. Mateo stated that he thinks that the smugglers have not taken him to his destination because when the smugglers were going to take him, the vehicle was disabled during a flash flood, and he did not help push the vehicle. Mateo claimed that the day of his arrest, he departed the stash house to fill water jugs and buy food. Mateo stated that he would pay the smugglers between \$50-100 USD to be granted that permission to leave and buy food or beverages. Mateo stated approximately nine (9) non-citizens were dropped off yesterday but was unaware who dropped them off.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

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CONTINUATION:

MATERIAL WITNESS 1 STATEMENT:

Ariel LOPEZ-Vidal, a Mexican citizen, was read his Miranda Rights and agreed to make a statement.

Lopez agreed to pay \$9,000 to be smuggled into the United States. Lopez indicated that after he crossed the river, he was taken to the stash house he was arrested in. Lopez stated "Mateo" would take food and would come to the stash house two or three times a day and sometimes stayed overnight. Lopez claimed that "Mateo" would instruct him to take pictures of the people that were inside the stash house and to send him the pictures. Lopez added that "Mateo" instructed him to tell the people at the stash house not to make noise. Lopez stated "Mateo" would buy backpacks, Pedialyte's, and sweaters and would sell them inside the stash house to all the people in the stash house. Ariel LOPEZ-Vidal identified Andres Mateo-Castillo, through a photo lineup, as "Mateo" the person who would bring food to them.

MATERIAL WITNESS 2 STATEMENT:

Jackeline Xiomara Giron-Araniva, a citizen and national of El Salvador, was advised of her Miranda Rights. She understood and agreed to provide a sworn statement.

Giron agreed to pay \$15,000 to be smuggled into the United States. Giron claimed to have crossed illegally into the United States on October 3, 2021, with the assistance of a guide. She was picked by an unknown person and eventually transported to the house where was encountered. Upon arrival at the house, her photo was taken, and her name was written on a notebook by a subject name "Tio". She stayed in the same room with Tio and another subject, later identified as Andres Mateo-Castillo. A few days later, she and Mateo developed a romantic relationship. She claimed to helped Mateo pick up food for other subjects at the house. She also claimed that Tio would pick up food for everybody and notify the subjects at the house when they are ready to be moved north. Giron-Araniva identified Andres Mateo-Castillo, through a photo lineup, as her boyfriend.

MATERIAL WITNESS 3 STATEMENT:

Roberto Rodriguez-Mancia, a Honduras citizen, was read his Miranda Rights and was willing to make a statement.

Rodriguez agreed to pay \$9,000 to be smuggled into the United States. Rodriguez claimed that after he crossed the river, he was taken to a Wal Mart store where he was picked up by a man driving a white van and took him to the stash house, he was arrested in. Rodriguez added that the man took him in the stash house and took his phone away and told him he would get it back once he left the stash house. Rodriguez stated the man took a photo of him and offered him food. Rodriguez indicated that the man showed him where he would be staying and offered him an air mattress. Rodriguez claimed the man only allow the people in the stash house to use their phone for 5 minutes and they were to return the phone back to him. Rodriguez stated he believes the man was the caretaker of the house. Roberto Rodriguez-Mancia identified Andres Mateo-Castillo, through a photo lineup, as the person who picked him up at Wal-Mart and as the caretaker of the house.